

Exhibit 4

Supplemental Expert Report of Marc Stern

Dockery v. Hall, No. 3:13-cv-326-WHB-JCG

Submitted December 29, 2017

Supplemental Expert Report of Dr. Marc Stern

1. Plaintiffs' counsel retained me to evaluate and opine on the adequacy of the system for delivering medical care to prisoners housed at the East Mississippi Correctional Facility ("EMCF").
2. I submitted an expert report on December 29, 2016 (the "December 2016 Expert Report") with my opinions regarding the adequacy of the system for delivering medical care to prisoners housed at the East Mississippi Correctional Facility. Because Defendant did not submit an expert report in response to mine, I did not submit a rebuttal report.
3. After submitting my December 2016 Expert Report, I reviewed the documents listed in **Exhibit 1**. These materials were produced to Plaintiffs after my December 29, 2016 expert report, and address the system for delivering medical care to prisoners at EMCF through July 2017. Based on my review of the documents in Exhibit 1, I reaffirm the opinions listed in my December 2016 Expert Report, which continue to apply to the medical care system at EMCF in 2017. As I stated in my December 2016 report, I continue to believe that an "adequate health care system does not exist at EMCF" and therefore "the entire inmate population at EMCF [is] at constant substantial risk of serious injury."
4. Since the submission of my initial report, I have served as an expert witness and correctional consultant, and given deposition or trial testimony in the following case:
 - a. Walter v. Correctional Healthcare Companies, *et al.* US District Court, District of Colorado, 2017 (deposition).

Respectfully Submitted:



Marc F. Stern, MD, MPH

Exhibit 1

Supplemental Documents Considered in Forming Expert Opinion

Audits and CQI Reports

1. Apr. 2017 CQI Report: CENT-DOCKERY-ELEC-035154
2. Dec. 2016 CQI Report: CENT-DOCKERY-ELEC-035155
3. Nov. 2016 CQI Report: CENT-DOCKERY-ELEC-035156
4. Oct. 2016 CQI Report: CENT-DOCKERY-ELEC-035157
5. Feb. 2017 CQI Report: CENT-DOCKERY-ELEC-035158
6. Jan. 2017 CQI Report: CENT-DOCKERY-ELEC-035159
7. Mar. 2017 CQI Report: CENT-DOCKERY-ELEC-035160
8. Jul. 2016 CQI Report: CENT-DOCKERY-ELEC-035161
9. Jun. 2016 CQI Report: CENT-DOCKERY-ELEC-035162
10. May 2016 CQI Report: CENT-DOCKERY-ELEC-035163
11. Apr. 2016 CQI Report: CENT-DOCKERY-ELEC-035164
12. Sep. 2016 CQI Report: CENT-DOCKERY-ELEC-035165
13. Aug. 2016 CQI Report: CENT-DOCKERY-ELEC-035166

Contracts

1. ASAP EMS: CENT-DOCKERY-ELEC-035167-035188
2. Biomedical Systems: CENT-DOCKERY-ELEC-035189-035201
3. BioReference Lab: CENT-DOCKERY-ELEC-035202-035223
4. Boswell Pharmacy Services: CENT-DOCKERY-ELEC-035224-035243
5. Boswell Pharmacy Services: CENT-DOCKERY-ELEC-035244-035258
6. MSDH MOU for IGRA project: CENT-DOCKERY-ELEC-035259-035261
7. CharDonnay Dialysis, Inc: CENT-DOCKERY-ELEC-035262-035283
8. Henry Schein, Inc: CENT-DOCKERY-ELEC-035284-035302
9. IHS Pharmacy: CENT-DOCKERY-ELEC-035303-035306
10. Institutional Eye Care 2015: CENT-DOCKERY-ELEC-035307-035328
11. Institutional Eye Care 2016: CENT-DOCKERY-ELEC-035329-035331
12. Institutional Eye Care 2017: CENT-DOCKERY-ELEC-035332
13. McKesson Medical-Surgical: CENT-DOCKERY-ELEC-035333-035361
14. Mobic Medic Ambulance Service: CENT-DOCKERY-ELEC-035362-035385
15. Mobic Medic Ambulance 2016: CENT-DOCKERY-ELEC-035386-035387
16. MS Blood Services: CENT-DOCKERY-ELEC-035388-035392
17. MS DoH_MS_MOU for 3HP: CENT-DOCKERY-ELEC-035393-035395
18. MS DoH_MS_MOU for IGRA: CENT-DOCKERY-ELEC-035396-035398
19. Novasom: CENT-DOCKERY-ELEC-03539 -035420
20. PRIDE Enterprises: CENT-DOCKERY-ELEC-035421-035434
21. Propet USA 2015: CENT-DOCKERY-ELEC-035435-035444

22. Propet USA 2016: CENT-DOCKERY-ELEC-035445–035446
23. Quality Mobile X-ray Services: CENT-DOCKERY-ELEC-03544–0354471
24. River City Dental Lab: CENT-DOCKERY-ELEC-035472–035483
25. Buckner Prosthetics and Orthotics Lab: CENT-DOCKERY-ELEC-035484–035505
26. Stericycle: CENT-DOCKERY-ELEC-035506–035511
27. UMMC_MS_ID and 340B Agreement: CENT-DOCKERY-ELEC-035512–035538
28. Wingnut Holdings Medical: CENT-DOCKERY-ELEC-035539 –035548
29. Centurion 2015 Contract: CENT-DOCKERY-ELEC-034678-034784
30. Centurion 2016 Contract: CENT-DOCKERY-ELEC-034785 -034841

Medical Records

1. David Gordon MDOC#: 186216
2. Johnny Holton MDOC#: 171577
3. Lebarrio Yusef Safford MDOC#: R8584
4. Blake Leslie MDOC#: 172767
5. Jason Holloway MDOC#: M0998
6. Bilethon Autry MDOC#: 133725
7. Anthony Laury MDOC #: 81227
8. Thomas L Sides MDOC#: 79338
9. Cyd Allen MDOC#: 178375
10. Willie Taylor MDOC#: 158207
11. Larod Montre Gross MDOC#: L6029
12. Eugene A Johnson MDOC#: N8911
13. Nathan Dean Bryant MDOC#: 75067
14. Larry Jackson MDOC#: 18692
15. Damon Dixon MDOC#: 141859
16. Robert J Carrier MDOC#: K0013
17. Tishar Holmes MDOC#: 161311
18. Harvey Eugene Langdon MDOC#: 182473
19. Rick Lamar Griffin MDOC#: R0578
20. Shawn R Brown MDOC#: K7268

ARPs

1. 2017 ARP 005007 (EMCF-17-553)
2. 2017 ARP 004936 (EMCF-17-549)
3. 2017 ARP 004834 (EMCF-17-540)
4. 2017 ARP 004250 (EMCF-17-505)
5. 2017 ARP 004127 (EMCF-17-491)
6. 2017 ARP 004172 (EMCF-17-496)
7. 2017 ARP 004117 (EMCF-17-489)

8. 2017 ARP 004107 (EMCF-17-488)
9. 2017 ARP 004098 (EMCF-17-487)
10. 2017 ARP 004067 (EMCF-17-483)
11. 2017 ARP 004044 (EMCF-17-481)
12. 2017 ARP 004026 (EMCF-17-478)
13. 2017 ARP 004010 (EMCF-17-476)
14. 2017 ARP 003999 (EMCF-17-475)
15. 2017 ARP 003861 (EMCF-17-460)
16. 2017 ARP 003958 (EMCF-17-470)
17. 2017 ARP 003841 (EMCF-17-458)
18. 2017 ARP 003834 (EMCF-17-457)
19. 2017 ARP 003824 (EMCF-17-456)
20. 2017 ARP 003817 (EMCF-17-455)
21. 2017 ARP 003807 (EMCF-17-454)
22. 2017 ARP 003547 (EMCF-17-432)
23. 2017 ARP 003540 (EMCF-17-431)
24. 2017 ARP 003518 (EMCF-17-430)
25. 2017 ARP 003473 (EMCF-17-428)
26. 2017 ARP 003420 (EMCF-17-425)
27. 2017 ARP 003363 (EMCF-17-422)
28. 2017 ARP 003282 (EMCF-17-417)
29. 2017 ARP 003272 (EMCF-17-415)
30. 2017 ARP 003262 (EMCF-17-415)
31. 2017 ARP 003181 (EMCF-17-409)
32. 2017 ARP 003150 (EMCF-17-405)
33. 2017 ARP 003120 (EMCF-17-401)
34. 2017 ARP 003112 (EMCF-17-400)
35. 2017 ARP 003070 (EMCF-17-396)
36. 2017 ARP 003043 (EMCF-17-393)
37. 2017 ARP 003007 (EMCF-17-389)
38. 2017 ARP 003000 (EMCF-17-388)
39. 2017 ARP 002901 (EMCF-17-381)
40. 2017 ARP 002758 (EMCF-17-367)
41. 2017 ARP 002850 (EMCF-17-377)
42. 2017 ARP 002691 (EMCF-17-359)
43. 2017 ARP 002720 (EMCF-17-363)
44. 2017 ARP 002644 (EMCF-17-354)
45. 2017 ARP 002626 (EMCF-17-353)
46. 2017 ARP 002611 (EMCF-17-352)
47. 2017 ARP 002563 (EMCF-17-347)

48. 2017 ARP 002463 (EMCF-17-336)
49. 2017 ARP 002543 (EMCF-17-344)
50. 2017 ARP 002457 (EMCF-17-335)
51. 2017 ARP 002441 (EMCF-17-333)
52. 2017 ARP 002429 (EMCF-17-332)
53. 2017 ARP 002371 (EMCF-17-326)
54. 2017 ARP 002362 (EMCF-17-325)
55. 2017 ARP 002332 (EMCF-17-321)
56. 2017 ARP 002042 (EMCF-17-295)
57. 2017 ARP 001833 (EMCF-17-276)
58. 2017 ARP 001803 (EMCF-17-273)
59. 2017 ARP 001796 (EMCF-17-272)
60. 2017 ARP 001763 (EMCF-17-269)
61. 2017 ARP 001640 (EMCF-17-257)
62. 2017 ARP 001684 (EMCF-17-261)
63. 2017 ARP 001617 (EMCF-17-255)
64. 2017 ARP 001568 (EMCF-17-249)
65. 2017 ARP 001591 (EMCF-17-252)
66. 2017 ARP 001479 (EMCF-17-239)
67. 2017 ARP 001563 (EMCF-17-248)
68. 2017 ARP 001551 (EMCF-17-246)
69. 2017 ARP 001470 (EMCF-17-238)
70. 2017 ARP 000931 (EMCF-17-202)
71. 2017 ARP 001457 (EMCF-17-235)
72. 2017 ARP 001356 (EMCF-17-226)
73. 2017 ARP 001212 (EMCF-17-220)
74. 2017 ARP 000969 (EMCF-17-207)
75. 2017 ARP 000938 (EMCF-17-203)
76. 2017 ARP 000872 (EMCF-17-195)
77. 2017 ARP 000906 (EMCF-17-199)
78. 2017 ARP 000810 (EMCF-17-190)
79. 2017 ARP 000857 (EMCF-17-193)
80. 2017 ARP 000760 (EMCF-17-173)
81. 2017 ARP 000534 (EMCF-17-89)
82. 2017 ARP 000590 (EMCF-17-118)
83. 2017 ARP 000518 (EMCF-17-88)
84. 2017 ARP 000507 (EMCF-17-87)
85. 2017 ARP 000494 (EMCF-17-86)
86. 2017 ARP 000445 (EMCF-17-80)
87. 2017 ARP 000319 (EMCF-17-57)

88. 2017 ARP 000433 (EMCF-17-78)
89. 2017 ARP 000343 (EMCF-17-60)
90. 2017 ARP 000185 (EMCF-17-18)
91. 2017 ARP 000136 (EMCF-17-13)
92. 2017 ARP 000106 (EMCF-17-11)
93. 2017 ARP 000031 (EMCF-17-04)
94. 2017 ARP 005073 (EMCF-17-558)
95. 2017 ARP 005172 (EMCF-17-565)
96. 2017 ARP 005208 (EMCF-17-568)
97. 2017 ARP 005387 (EMCF-17-575)
98. 2017 ARP 005432 (EMCF-17-578)
99. 2017 ARP 005457 (EMCF-17-580)
100. 2017 ARP 005809 (EMCF-17-628)
101. 2017 ARP 005877 (EMCF-17-635)
102. 2017 ARP 006000 (EMCF-17-649)
103. 2017 ARP 006055 (EMCF-17-653)
104. 2017 ARP 006096 (EMCF-17-658)
105. 2017 ARP 006135 (EMCF-17-663)
106. 2017 ARP 006161 (EMCF-17-666)
107. 2017 ARP 006217 (EMCF-17-675)
108. 2017 ARP 006355 (EMCF-17-695)
109. 2017 ARP 006385 (EMCF-17-699)
110. 2017 ARP 006462 (EMCF-17-710)
111. 2017 ARP 004936 (EMCF-17-549)
112. DEF-303747-DEF-303751 (EMCF-17-963)
113. Grievance Detail: DEF-217787
114. Grievance Detail: DEF-217793
115. Grievance Detail: DEF-217795
116. Grievance Detail: DEF-217802
117. Grievance Detail: DEF-217822

Patient Documents

1. Jun 2 – Jun 8, 2017: DEF-304305
2. Jun 9 – Jun 15, 2017: DEF-304433
3. May 19 – May 25, 2017: DEF-305348
4. May 12- May 18, 2017: DEF- 305263
5. May 26 – June 1, 2017: DEF-305425
6. Apr 7 – Apr 13, 2017: DEF-304017
7. Apr 14 – Apr 20, 2017: DEF-304105
8. Apr 21 – Apr 27, 2017: DEF-304195

9. Apr 28 – May 4, 2017: DEF-304290
10. Jun 2 – Jun 8, 2017: DEF-304388
11. Jun 16 – Jun 22, 2017: DEF-304521
12. Mar 3 – Mar 9, 2017: DEF-304779
13. Mar 10- Mar 16, 2017: DEF-304846
14. Mar 10- Mar 16, 2017: DEF-304865
15. Mar 17 – Mar 23, 2017: DEF-304939
16. May 26 – Jun 1, 2017: DEF-305500
17. Mar 24 – Mar 30, 2017: DEF-305020
18. May 5 – May 11, 2017: DEF-305214
19. May 12 – May 18, 2017: DEF-305312
20. May 19 – May 25, 2017: DEF-305403
21. Feb 24 – Mar 2, 2017: DEF-303892
22. Apr 7 – Apr 13, 2017: DEF-303993
23. Apr 14 – Apr 20, 2017: DEF-304083
24. Apr 21 – Apr 27, 2017: DEF-304149
25. Apr 28 – May 4, 2017: DEF-304270
26. Jun 2 – Jun 8, 2017: DEF-304335
27. Mar 3- Mar 9, 2017: DEF-304753
28. Mar 10 – Mar 16, 2017: DEF-304836
29. May 7 – May 11, 2017: DEF-305198
30. May 12 – May 18, 2017: DEF-305287
31. May 19 – May 25, 2017: DEF-305372
32. May 26 – Jun 1, 2017: DEF-305482
33. Mar 24 – Mar 30, 2017: DEF-305000
34. Seg Log 3-30-2017: DEF-304950
35. Seg Log 4-6-2017: DEF-305038

Incident Reports

1. EMCF-17-0287-PUOF-17-0086
2. EMCF-17-0281-SUOF-0093
3. EOR EMCF-17-0329
4. EOR EMCF-17-0356
5. EOR EMCF-17-0596
6. EOR EMCF-16-0134
7. EOR EMCF-16-0053
8. EOR EMCF-16-0044
9. EOR EMCF-16-0057
10. EOR EMCF-16-0043
11. EOR EMCF-16-0014

12. EOR EMCF-16-0053
13. EOR EMCF-16-0145
14. EOR EMCF-16-0258
15. EOR EMCF-16-0273
16. EOR EMCF-16-0276
17. EOR EMCF-16-307
18. EOR EMCF-16-0333
19. EOR EMCF-16-0339
20. EOR EMCF-16-0348
21. EOR EMCF-16-0385
22. EOR EMCF-16-0414
23. EOR EMCF-16-0443
24. EOR EMCF-16-0488
25. EOR EMCF-16-0490
26. EOR EMCF-16-0591
27. EOR EMCF-17-0109
28. EOR EMCF-17-0121
29. EOR EMCF-17-0303
30. EOR EMCF-17-0310
31. EOR EMCF-17-0329
32. EOR EMCF-17-0561
33. EOR EMCF-17-0267
34. EOR EMCF-17-0281
35. EOR EMCF-17-0222

Reports and Other Documentation

1. F. Taylor Med. Exam. Report: :CENT-DOCKERY-ELEC-033343-033349
2. T. Hall Med. Exam. Report: CENT-DOCKERY-ELEC-033325-033330
3. Centurion Drug Formulary: CENT-DOCKERY-ELEC-033293-033320
4. Inpatient Days Log_Apr. 2016: CENT-DOCKERY-ELEC-033496
5. Inpatient Days Log_Apr. 2017: CENT-DOCKERY-ELEC-033497
6. Inpatient Days Log_Aug. 2016: CENT-DOCKERY-ELEC-033501
7. Inpatient Days Log_Dec. 2016: CENT-DOCKERY-ELEC-033505
8. Inpatient Days Log_Feb.2017: CENT-DOCKERY-ELEC-033494
9. Inpatient Days Log_Jul. 2016: CENT-DOCKERY-ELEC-033500
10. Inpatient Days Log_Mar. 2017: CENT-DOCKERY-ELEC-033495
11. Inpatient Days Log_May 2016: CENT-DOCKERY-ELEC-033498
12. Inpatient Days Log_May 2017: CENT-DOCKERY-ELEC-033499
13. Inpatient Days Log_Nov. 2016: CENT-DOCKERY-ELEC-033504
14. Inpatient Days Log_Oct. 2016: CENT-DOCKERY-ELEC-033503

15. Inpatient Days Log_Sep. 2016: CENT-DOCKERY-ELEC-033502
16. MDOC Monthly Report July 2015 – June 2016: DEF-215921-DEF-215934
17. MDOC Monthly Report July 2016 – Feb 2017: DEF-300279-DEF-300395
18. MDOC Monthly Report July 2016 – March 2017: DEF-300296-DEF-300312
19. MDOC Monthly Report July 2016 – April 2017: DEF-30013 – DEF-30029
20. MDOC Monthly Report July 2016 – May 2017: DEF-30030 – DEF-300346
21. MDOC Monthly Report July 2016- June 2017: DEF-302176-DEF-302192
22. MDOC Monthly Report July 2016- Jan. 2017: DEF-215935 – DEF-215951
23. MDOC Contract Monitoring Worksheet, Jan 2017: DEF-311883-DEF-311898
24. MDOC Contract Monitoring Worksheet, Feb 2017: DEF-311899 – DEF-311914
25. MDOC Contract Monitoring Worksheet, Mar 2017: DEF-311915 – DEF-311930
26. MDOC Contract Monitoring Worksheet, May 2017: DEF-311931 – DEF-311947
27. MDOC Contract Monitoring Worksheet, Jun 2017: DEF-311948 – DEF-311964
28. Weekly Contract Monitor Report Dec. 10- Dec 17, 2016: DEF-212983-DEF-212984
29. Weekly Contract Monitory Report Dec.17- Dec 24, 2016: DEF-212985-DEF-212986
30. Centurion FTEs: CENT-DOCKERY-ELEC-033290- 033292
31. Centurion Onboarding Since March 2017: CENT-DOCKERY-ELEC-033354
32. Provider Agreement: CENT-DOCKERY-ELEC-033355-033379
33. March 2017 Chronic Care List: CENT-DOCKERY-ELEC-033396-033429
34. June 2016 Chronic Care List: CENT-DOCKERY-ELEC-033430-033450
35. September 2016 Chronic Care List: CENT-DOCKERY-ELEC-033451-033472
36. December 2016 Chronic Care List: CENT-DOCKERY-ELEC-033473-033486
37. 2016 Contract Compliance Review Report: CENT-DOCKERY-ELEC-033262-033289
38. 2017 Contract Compliance Review: CENT-DOCKERY-ELEC-033380–0333395
39. Medical Examiner’s Report for D. Gordon, Thomas Hall, Charles McGrew, Anthony Melton, Freddie Taylor, and Edward Williams; CENT-DOCKERY-ELEC-033321-033353
40. J. Gentry Medical Examiner’s Report: CENT-DOCKERY-ELEC-033487–033493
41. Nurse, MH, Sick Call, Apr 2016 – May 2017: CENT-DOCKERY-ELEC-034477-034677
42. Nurse Sick Call, Apr 2016 – Jun 2017: CENT-DOCKERY-ELEC-033512-034476

Deposition Testimony¹

1. Deposition Transcript of MDOC 30(b)(6), Gloria Perry, M.D. Designee
2. Deposition Transcript of Gloria Perry (fact deposition)
3. Deposition Transcript of Tony Compton
4. Deposition Transcript of Kim Nagel, M.D.
5. Deposition Transcript of Simone Jones
6. Deposition Transcript of Norris Hogans
7. Deposition Transcript of Marylin Braxton
8. Deposition Transcript of Frank Shaw

¹ The depositions reviewed included the corresponding deposition exhibits.

9. Deposition Transcript of Rolando Abangan
10. Deposition Transcript of Kimberly Townsend
11. Deposition Transcript of Penny Brookshire